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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

BECKY WRIGHT

Plaintiff,

v.

STANDARD INSURANCE COMPANY,

Defendant.

Case No. 3:18-cv-1948-YY

**JOINT STIPULATED MOTION FOR
EXTENSION OF TIME OF CASE
DEADLINES**

Expedited Review Requested

CERTIFICATION PER L.R. 7.1

The undersigned have conferred and agree upon the contents of this motion.

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**JOINT STIPULATED MOTION FOR EXTENSION OF TIME OF
CASE DEADLINES- p. 1 of 2**

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MOTION

The undersigned respectfully move this Court for an order resetting the current case schedule in this disability benefit case, which is subject to the Employee Retirement Income Security Act, 29 U.S.C. 1001, *et. seq.* (ERISA), as follows:

Deadline to file stipulated record for judicial review: Extension from September 20, 2019 to October 16, 2019;

Dispositive motions deadline: Extension from September 27, 2019 to October 23, 2019 (with Response and Reply deadlines pursuant to Local Rule).

The parties make this request because they continue to have an unresolved dispute regarding the contents of the record for review and because they are actively engaged in settlement negotiations and would benefit from additional time to attempt to resolve the dispute and case.

For the reasons set forth above, the parties respectfully request that this Court reset and set the case deadlines as set forth above.

DATED September 19, 2019

Respectfully submitted,

s/ Megan E. Glor

Megan E. Glor, OSB No. 930178

Of Attorneys for Plaintiff

s/ Andrew Altschul

Andrew Altschul, OSB No. 980302

Of Attorneys for Defendant